

George Torgun (Bar No. 222085)
Sejal Choksi-Chugh (Bar No. 222093)
SAN FRANCISCO BAYKEEPER
785 Market Street, Suite 850
San Francisco, California 94103
Telephone: (415) 856-0444
Facsimile: (415) 856-0443
Email: george@baykeeper.org
Email: sejal@baykeeper.org

Attorneys for Plaintiff
SAN FRANCISCO BAYKEEPER

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

SAN FRANCISCO BAYKEEPER, a non-profit corporation,

Plaintiff,

vs.

MARINE EXPRESS, Inc.,

Defendant.

Case No. C-13-5550-JCS

**MOTION TO RESCHEDULE THE CASE
MANAGEMENT CONFERENCE AND
ASSOCIATED DEADLINES;
[PROPOSED] ORDER**

Judge: Hon. Joseph C. Spero

WHEREAS, on Dec 2, 2013, Plaintiff San Francisco Baykeeper filed the above-entitled complaint;

WHEREAS, Plaintiff postponed serving Defendant Marine Express, Inc. with the complaint in good-faith pursuit of settlement to avoid the need for litigation;

WHEREAS, Plaintiff and Defendant are continuing to engage in settlement negotiations and anticipate reaching a settlement within the next month;

WHEREAS, the Initial Case Management Conference is scheduled for February 28, 2014, at 1:30 pm;

WHEREAS, the Scheduling Order states that if the Initial Case Management Conference is

1 continued, the other deadlines are continued accordingly;

2 WHEREAS, Plaintiff requests, upon the Court's approval, to reschedule the Case
3 Management Conference for March 28, 2014, at 1:30 pm, or at such later date that is convenient for
4 the Court, in order to give the Parties a chance to complete settlement negotiations without involving
5 the resources of the Court;

6 WHEREAS, Plaintiff requests, upon the Court's approval, to reschedule the deadlines to file
7 an ADR Certification and to file a Rule 26(f) Report to align with the new proposed Case
8 Management Conference date;

9 WHEREFORE, Plaintiff respectfully requests the Court to approve and enter the Proposed
10 Order below.

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12 Dated: January 31, 2014

13 Respectfully submitted,

14 SAN FRANCISCO BAYKEEPER

15 By: /s/ Sejal Choksi-Chugh
16 Sejal Choksi-Chugh
17 Attorney for Plaintiff
18 SAN FRANCISCO BAYKEEPER
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~~[PROPOSED]~~ ORDER

IT IS HEREBY ORDERED that the Case Management Conference set for February 28, 2014, is rescheduled for March 28, 2014 at 1:30 pm, and all associated deadlines be moved accordingly.

IT IS SO ORDERED.

NORTHERN DISTRICT COURT OF CALIFORNIA

Dated: 2/3/14

United States



